

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HELEEN MEES,

Plaintiff,

-against-

CITY OF NEW YORK, MANHATTAN
DISTRICT ATTORNEY'S OFFICE, CYRUS
VANCE, JR., NITIN SAVUR, JEANINE
LAUNAY, SAMANTHA SCHOTT,

Defendants.

NOTICE OF JOINT
MOTION TO DISMISS

19 Civ. 7346 (AJN)(KNF)

PLEASE TAKE NOTICE that upon the annexed Declaration of Assistant District Attorney Elizabeth N. Krasnow dated April 21, 2020, the exhibits listed therein, the accompanying memorandum of law, and all prior pleadings and proceedings herein, defendants City of New York, the New York County District Attorney's Office, District Attorney Cyrus R. Vance, Jr., and Assistant District Attorneys Nitin Savur, Jeanine Launay, and Samantha Schott will jointly move this Court before the Honorable Alison J. Nathan, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York, on a date to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 12(b)(1) and (b)(6) dismissing the amended complaint, with prejudice, as well as for any further relief the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that the briefing schedule endorsed by the Court on February 28, 2020, *see* ECF 55, requires that plaintiff file any opposition papers within sixty days from the date of this motion—i.e., by June 22, 2020—and that defendants file their reply papers within three weeks from the filing of plaintiff's opposition papers.

Dated: Stamford, Connecticut
April 21, 2020

CYRUS R. VANCE, JR.
District Attorney of New York County
One Hogan Place
New York, New York 10013
(212) 335-9000
Counsel for the DA defendants

By: *Elizabeth N. Krasnow /s*
Elizabeth N. Krasnow
Assistant District Attorney

Dated: New York, New York
April 21, 2020

JAMES E. JOHNSON
Corporation Counsel of the City of New York
100 Church Street
New York, New York 10007
(212) 356-2384
Counsel for the defendant City of New York

By: *William T. Gosling /s*
William Gosling
Assistant Corporation Counsel